

Exhibit B

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December 7, 2017

Via Email

RHC Review
Rural Health Care Program
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Re: Response of GCI Communication Corp. to RHC Telecommunications Program –
Rural and Urban Rate Information Request

Dear RHC Review,

On November 30, 2017, you requested additional information related to the one hundred and one (101) Rural and Urban Rate Information Requests that were received from the Rural Health Care (“RHC”) Telecommunications Program by the relevant Health Care Providers (“HCP”) for which GCI Communication Corp. (“GCI”) is the service provider on November 3, 2017.¹

GCI hereby responds to this request for supporting documentation that demonstrates that the rural rate reflects the average of the rates actually being charged to commercial customers for identical or similar services, other than HCPs, by the service provider in the rural area in which the HCP is located. GCI’s response is attached hereto in the format of an updated version of the Exhibit D that it included with the original submission and documentation referenced in Exhibit D that supports the rates listed in the exhibit.

GCI requests confidential treatment of the enclosed documentation, Exhibit D (the “Confidential Information”) and the supporting documentation referenced in the Exhibit and submitted with this letter, pursuant to Sections 0.457 and 0.459 of the Federal Communications Commission’s (“FCC”) rules, 47 C.F.R. §§ 0.457, 0.459, and requests the withholding of the designated information from any future public inspection. Additional information to support this request is below.

Confidentiality Request

GCI requests confidential treatment of the Confidential Information and the supporting documentation referenced in the Exhibit and submitted with this letter pursuant to Sections 0.457

¹ GCI provided a comprehensive response to the 101 requests on November 21, 2017.

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and 0.459 of the FCC's rules, 47 C.F.R. §§ 0.457, 0.459, and requests the withholding of the designated information from any future public inspection.

In support of GCI's requests for confidential treatment of the Confidential Information, GCI hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

GCI seeks confidential treatment with respect to its responses to one hundred and one (101) Rural and Urban Rate Information Requests received from the RHC Telecommunications Program by the HCPs for which GCI is the service provider.

2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

GCI is required to disclose the Confidential Information pursuant to the Rural and Urban Rate Information Requests issued by RHC Review. This is sensitive commercial information that GCI does not make otherwise publicly available. Public disclosure of these measures could cause competitive commercial harm to GCI.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The information for which GCI seeks confidential treatment contains sensitive "trade secrets or privileged or confidential commercial, financial or technical data," which would customarily be guarded from competitors.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The Alaskan wireline, wireless, and broadband market is subject to competition.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Disclosure of GCI's Confidential Information would cause substantial competitive harm. *First*, disclosure would reveal in detail GCI's HCP customer information. GCI's competitors and customers could use this information to determine GCI's competitive position and associated revenues. *Second*, disclosure of GCI's Confidential Information would place GCI at a competitive disadvantage, as GCI lacks the same information regarding its competitors.

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**6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure
(Section 0.459(b)(6))**

GCI does not distribute the Confidential Information to the public, government officials, competitors, or customers. Each page of the documentation containing any of the Confidential Information is clearly marked in bold-face type "GCI Proprietary – Not for Public Disclosure."

**7. Identification of Whether the Information Is Available to the Public and the
Extent of Any Previous Disclosure of the Information to Third Parties
(Section 0.459(b)(7))**

GCI's Confidential Information is and shall remain unavailable to the public. As noted in part 6 above, GCI has not previously disclosed to third parties, other than the undersigned counsel, any of the Confidential Information.

**8. Justification of Period During Which the Submitting Party Asserts that
Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))**

GCI requests that the Confidential Information not be disclosed for 10 years from the date of this request. By that time, the sensitivity of GCI's commercial information will have diminished, as market changes will render it increasingly dated, and would make it difficult for competitors to gauge GCI's current market position and revenues.

* * * *

We hope the supporting documentation resolves your inquiry regarding GCI's response to the rural and urban rate information requests for the HCPs for which GCI provides service. Should you have further questions or require additional explanation or documentation, please contact me immediately so that I can provide further assistance to resolve this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Bagg".

Jennifer P. Bagg
Counsel to GCI Communication Corp.

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EXHIBIT D

Customer Comparables Sheet Revised Redacted in Entirety

GCI TERRA Customer Comparables Redacted in Entirety

GCI Satellite Customer Comparables Redacted in Entirety

GCI Terrestrial Customer Comparables Redacted in Entirety